

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

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In re: :  
: Chapter 11  
2964 Brighton 6<sup>th</sup> Realty Corp. :  
: Case No. 19-44355  
  
Debtors. :  
:  
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**DEBTORS' APPLICATION FOR AN ORDER ESTABLISHING  
DEADLINES FOR FILING PROOFS OF CLAIM AND APPROVING  
THE FORM AND MANNER OF NOTICE THEREOF**

2964 Brighton 6<sup>th</sup> Realty Corp. (the “Debtor”), by and through its’ counsel The Law Offices of Joshua Bronstein & Associates, PLLC, submits this application (the “Application”) pursuant to sections 105, 501 and 502(b)(9) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2002 and 3003(c)(3) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 3003-1 of the Local Bankruptcy Rules for the Eastern District of New York, and General Order M-453 *Procedural Guidelines for Filing Requests for Orders to Set the Last Date for Filing Proofs of Claim*, dated June 28, 2013, as updated on December 1, 2015 (the “Guidelines”), for entry of the proposed *Order Establishing Deadlines to File Proofs of Claim and Approving the Form and Notice Thereof* (the “Bar Date Order”) (I) establishing (A) September 26, 2019 as the General Bar Date (as defined in the Bar Date Order); (B) January 20, 2020 as the Governmental Bar Date (as defined in the Bar Date Order) (the General Bar Date and Governmental Bar Date, together as the “Bar Dates”); and (II) approving the form of notice of the Bar Dates. In support of the Application, the Debtor respectfully state as follows:

(B) In support of the Application, the Debtor respectfully state as follows:

1. On July 17, 2019 (the “Petition Date”), the Debtor filed voluntary petition for relief under Chapter 11 the Bankruptcy Code.

2. The Debtor is managing its’ property as a debtor-in-possession pursuant to § 1107(a) and 1108 of the Bankruptcy Code.

3. Notice of this Application will be provided to the Office of the United States Trustee and all interested parties requesting notice pursuant to Bankruptcy Rule 2002.

4. Upon information and belief, the only creditors in this case are Christiana Trust, a Division of Wilmington Savings Fund Society, As Trustee for Normandy Loan Mortgage Trust, Series 2013-2018, and the New York City Department finance.

5. The establishment of the Bar Dates is necessary to the efficient administration of these cases and will assist in evaluating the total universe of claims asserted against the Debtor. In addition, the Debtor seeks to sell its’ single asset real estate and pay off all its debt. To this end, in order to determine the extent, validity, and priority of claims that will be asserted against the Debtors, the Debtor seeks entry of the Bar Date Order.

6. No prior request for relief sought herein has been made of this or any other court.

WHEREFORE, the Debtors respectfully request the entry of the attached Bar Date Order, together with such other and further relief as this Court may deem just, proper and necessary.

Dated: Port Washington, NY

August 15, 2019

THE LAW OFFICES

OF JOSHUA BRONSTEIN &  
ASSOCIATES, PLLC

By: /s/ Joshua Bronstein

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